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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT JUNEAU**

MYRNA I. JOHNSON,)
Plaintiff,)
vs.)
FRED MEYER SOTRES, INC.;)
JAIME SAN MIGUEL,)
Defendants.) **CASE NO. J 04-0008 CV (JWS)**

STIPULATION FOR 60 DAY EXTENSION OF DISCOVERY

COME NOW the parties, through their respective counsel or record, and pursuant to AKR USDCT LR 16.1(c)(3)[A], agree and stipulate to extend discovery in this matter for sixty (60) days, from its original closure date of May 1, 2006 to July 1, 2006.

The following discovery remains to be accomplished in this time period:

- Management and 30(b)(6) depositions are scheduled to occur of defendants' witnesses in Portland, Oregon on May 24 and May 25, 2006;
- Plaintiff will file a Final Witness List by May 31, 2006;
- Defendants may elect to take the depositions of newly identified witnesses in that Final Witness List during the month of June.

1 Dated: May 22, 2006

CHOATE LAW FIRM LLC

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3 *s/ Mark Choate*

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Dated: May 22, 2006

MILLER & NASH LLP

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13 *s/ James R. Dickens*

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Attorneys for Defendants

PROOF OF SERVICE

I am employed in the City and Borough of Juneau, State of Alaska. I am over the age of 18 and not a party to the within action. My business address is 424 N. Franklin Street, Juneau, AK 99801.

On May 22, 2006, I served the foregoing document described as **STIPULATION FOR 60 DAY EXTENSION ON DISCOVERY**, on the interested parties in this action by serving the original true copies, addressed as follows:

James Dickens
Miller Nash LLP
4400 Two Union Square
601 Union Street
Seattle, WA 98101-2352
Telephone: (206) 622-8484
Facsimile: (206) 622-7485

Peter Gruenstein
Gruenstein & Hickey
500 L. Street, Suite 401
Anchorage, AK 99501
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Facsimile: (907) 258-4350

By mail, I deposited such envelope(s) in the mail at Juneau, Alaska, with postage thereon fully prepaid.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Juneau, Alaska, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

- By personal service, I delivered such envelope(s) by hand to the __ office(s); ____ court box of the addressee(s).
- By facsimile, I transmitted such documents from Juneau, Alaska, to the offices of the addressee(s).
- By email, I transmitted such documents from Juneau, Alaska, to the email address of the addressee(s).
- By electronic service through the court of record's electronic service system.

1 X I declare that I am employed in the office of a member of the Bar of this Court, at whose
2 direction the service was made.

3 Executed on May 22, 2006 at Juneau, Alaska.

4 *s/ Mark Choate*

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 MARK CHOATE